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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8307

UNITED STATES OF AMERICA, Plaintiff,	Magistrate Case No.:
v.	COMPLAINT FOR VIOLATION OF
Ramon Guadalupe SOBERANES-Fierro, Defendant.	21 U.S.C. § 952 and 960 Importation of a Controlled Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about April 7, 2008, within the Southern District of California, defendant Ramon Guadalupe SOBERANES-Fierro did knowingly and intentionally import approximately 18.26 kilograms (40.17 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Lonnie Brasby, Special Agent
U.S. Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 8TH DAY OF APRIL 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

UNITED STATES OF AMERICA
v.
Ramon Guadalupe SOBERANES-Fierro

STATEMENT OF FACTS

This Statement of Facts is based on the reports, documents, and notes furnished to U. S. Immigration and Customs Enforcement Special Agent Lonnie Brasby.

On April 7, 2008, at approximately 1339 hours, Ramon Guadalupe SOBERANES-Fierro entered the United States at the Calexico, CA, West Port of Entry. SOBERANES-Fierro was the driver of a 2004 Nissan X-Trail.

At primary inspection, SOBERANES-Fierro gave a negative Customs declaration to Customs and Border Protection Primary Officer (CBPO) C. Carrillo. SOBERANES-Fierro's hand was trembling when he handed CBPO C. Carrillo his Border Crossing Card (BCC). During questioning, SOBERANES-Fierro advised CBPO C. Carrillo that he was on his way to buy tennis shoes. CBPO C. Carrillo referred SOBERANES-Fierro to secondary for a more intensive inspection.

In the vehicle secondary lot, Canine Enforcement Officer A. Gonzalez utilized his Narcotic Detector Dog, who alerted to the dashboard area of the vehicle. A subsequent inspection of the vehicle revealed seventeen (17) packages, which were discovered in a compartment located within the engine firewall area of the vehicle. One of the packages was probed and a sample of a white powdery substance was obtained, which field tested positive for cocaine. The 17 packages had a combined net weight of approximately 18.26 kilograms (40.17 pounds) of cocaine.

SOBERANES-Fierro was arrested for importation of cocaine into the United States. SOBERANES-Feirro was advised of his rights, per Miranda. SOBERANES-Fierro stated that he understood his rights and was willing to answer questions without the presence of an attorney. SOBERANES-Fierro admitted knowledge of the narcotics concealed in the vehicle and was to be paid $500.00 for the smuggling venture.